

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TEAM WORLDWIDE CORPORATION	§	
	§	
v.	§	Case No. 2:17-CV-0235-JRG
	§	
WAL-MART STORES, INC., ET AL.	§	

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiff Team Worldwide Corporation and Defendants/Intervenors Wal-Mart Stores Texas, LLC, Walmart.com USA LLC, and Sam’s West, Inc. d/b/a Sam’s Club, Intex Recreation Corp., Intex Trading Ltd., The Coleman Company, Inc., and Bestway (USA), Inc. (collectively, “the Parties”) have settled their respective claims for relief asserted in this litigation¹. Accordingly, the Parties respectfully request that all claims for relief asserted against Defendants/Intervenors, or any of them, by Plaintiff herein are dismissed, with prejudice; and the Parties further request that all attorneys’ fees, costs of court and expenses be borne by each Party incurring the same. The Parties also respectfully request that this Court retain jurisdiction to enforce the agreement executed by the Parties settling this action.

Dated: November 19, 2018

Respectfully submitted,

¹ The Settlement Agreement was signed by: Ken Wang, General Manager of Team Worldwide Corporation, on November 18, 2018; Eric Findlay, Counsel of Record with authority to sign on behalf of WalMart, Inc., Wal-Mart Stores Texas, LLC, Walmart.com USA LLC and Sam’s West, Inc. d/b/a Sam’s Club, on November 19, 2018; Trevor Carter, Counsel of Record with authority to sign on behalf of Intex Recreation Corp., Intex Development Company Ltd., and Intex Trading Ltd., on November 19, 2018; Patrizio Fumagalli, CSO of Bestway (USA) Inc., on November 19, 2018; and Mark P. Clements, Vice President, Litigation for The Coleman Company, Inc., on November 19, 2018.

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CERTIFICATE OF SERVICE

I hereby certify that the all counsel of record who are deemed to have consented to electronic service are being served this 19th day of November, 2018, with a copy of this document via CM/ECF.

/s/ Elizabeth L. DeRieux